

INSTRUCTIONS FOR ANNUAL CIVIL RIGHTS TRAINING FOR THE EMERGENCY FOOD ASSISTANCE PROGRAM (TEFAP) AND/OR THE COMMODITY SUPPLEMENTAL FOOD PROGRAM (CSFP)

Federal Requirement Regarding Civil Rights Training

In accordance with FNS Policy Memo FD-113 all agencies that receive federal financial assistance (including food) must provide civil rights training for volunteers and staff involved in all levels of the administration of these programs on an annual basis. This requirement applies to TEFAP and CSFP.

Eligible Recipient Agencies (ERA) are responsible for providing their staff and volunteers that interact with clients and/or who handle personal information of clients with training on civil rights on an annual basis. The ERA will ensure that their sub distributing sites provide training for their staff and volunteers on an annual basis.

The ERA will ensure that they and their sub distributing sites have in place a notification system that includes informing applicants and clients, at the service delivery point, of their right to file or make a verbal complaint including an anonymous complaint. At a minimum, this can be accomplished by posting the USDA Title VI "And Justice for All" non-discrimination poster displayed in a conspicuous location at all food pantries and meal programs.

The California Department of Social Services (CDSS) has provided three approved civil rights training tools for agencies to use when conducting training. These tools include:

- The EFAP/CSFP Civil Rights Webinar
- The Civil Rights Training Checklist for TEFAP and CSFP (Frontline and Non-Frontline Versions)

One of the checklists is for frontline staff/volunteers and one checklist is for non-frontline staff/volunteers (see definitions below). The PowerPoint presentation and webinar may be used for both frontline and non-frontline staff. Program managers must view the civil rights webinar. These civil rights training tools are available on the CDSS EFAP website at <http://www.cdss.ca.gov/inforesources/EFAP>.

Civil rights training for staff/volunteers should be approached in the following manner:

Instructions for Civil Rights Training- Program Managers

Definition – The ERA staff that manage TEFAP/ CSFP programs

Program managers must receive civil rights training. In order to certify that the program managers have received the training, each manager must view the civil rights webinar training and then sign and date the certificate provided at the end of the webinar.

Training for program managers should first occur during each individual's orientation prior to any contact with clients or their personal information, and then be repeated annually. The ERA must keep a copy of the webinar certificate on file for each program manager as proof of compliance with the required training policy. In accordance with TEFAP and CSFP document retention regulations, all program related paperwork must be maintained for a minimum of three years plus the current year.

Instructions for Civil Rights Training- Frontline Staff/Volunteers

Definition - Staff/volunteers who regularly interact with program applicants and participants, determine eligibility or handle personal client information. Staff or volunteers with management responsibilities for the administration of TEFAP or CSFP are considered frontline staff/volunteers even if they have minimal client contact.

Frontline staff/volunteers must receive civil rights training. In order to certify that the staff or volunteers have received the training, each person must either view the civil rights webinar training and sign the certificate **or** read and initial the “Frontline Staff/Volunteers Civil Rights Checklist” training tool. For those electing to use the training tool, each person is to indicate, with their initials, to the left of each bullet that they have read and understood the content. Upon completing the training, all frontline staff and volunteers must sign and date the bottom of the form.

Training for these frontline staff and volunteers should first occur during each individual's orientation prior to any contact with clients or their personal information and then be repeated annually. The ERA must keep a copy of the webinar certificate or signed training checklist on file for each of the frontline staff and volunteer as proof of compliance with the required training policy. In accordance with TEFAP and CSFP document retention regulations, all program related paperwork must be maintained for a minimum of three years plus the current year.

Instructions for Civil Rights Training - Non-Frontline Staff/Volunteers

Definition - Staff/volunteers, including minors, who do not handle personal information and who infrequently interact with program applicants, participants, or frontline staff.

Non-frontline staff/volunteers must receive civil rights training. In order to certify that the staff or volunteers have received the training, each person or group (see below) must either complete the civil rights webinar training with certificate **or** read and sign the “Non-Frontline Staff/Volunteers Civil Rights Checklist” training tool. For those electing to use the training tool, each person is to indicate, with their initials, to the left of each bullet that they have read and understood the content. The training tool must be reviewed by volunteers and staff prior to signing in for their shift the first time.

When convenient, large groups such as school classes or church groups may be read the civil rights training tool together. Agencies must then provide a way for the group's participants to indicate they have reviewed or heard the points in the training tool. For instance, the agency may have a single signature page where everyone can sign their names or a checkbox volunteers can check on a volunteer sign-in log indicating they have been read the document. Any kind of group form indicating those who received the training must list the day the training took place. A school teacher may initial each bullet and sign the checklist on behalf of their students.

The civil rights training for non-frontline staff/volunteers must occur prior to their shift on the first day they begin working or volunteering for the agency. Refresher training should be given once every three years. The ERA must keep a copy of the webinar certificate and/or signed checklist on file for each of the non-frontline staff or volunteer training as proof of compliance with the required training policy. In accordance with the EFAP and CSFP document retention regulations, all program related paperwork must be maintained for a minimum three years plus the current year.

Instructions for Civil Rights Training - Other Staff/Volunteers

Staff/volunteers who do not interact in any way with program applicants and participants and who do not handle clients' personal information do not need civil rights training.